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**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

Federal Communications Commission  
Office of the Secretary

In the Matter of  
Administration of the  
North American Numbering Plan

**REPLY COMMENTS OF  
LOCAL AREA TELECOMMUNICATIONS, INC.**

Local Area Telecommunications, Inc. ("LOCATE"), by its undersigned counsel, submits its reply comments pursuant to the Commission's Public Notice, DA 91-1307, released October 18, 1991, in support of the Petition for a Notice of Inquiry filed by the National Association of Regulatory Utility Commissioners ("NARUC") concerning the North American Numbering Plan ("NANP"). As discussed herein, LOCATE supports NARUC's proposal to commence a proceeding to examine the existing NANP and its administration. Such an inquiry would, in LOCATE's view, facilitate the prompt and successful implementation of advanced personal communications services ("PCS") technology in the United States.

**DISCUSSION**

LOCATE, headquartered in New York City, is a leading provider of alternative intracity specialized radio telecommunications services. Through its extensive state-of-the-

art, digital microwave facilities, operated pursuant to Commission authorizations, LOCATE provides a broad array of competitive access communications services, including data, voice and video transmission capabilities, in various metropolitan areas throughout the country. Since 1983, LOCATE has served a diverse group of customers, including interexchange carriers and large business users such as banks, brokerage houses and other financial institutions. In addition, cellular operators subscribe to LOCATE's services to obtain essential microwave radio connections between cellsites. LOCATE also is one of the few existing Digital Termination Service ("DTS") licensees that has installed and is currently operating a DTS system.

LOCATE has also distinguished itself as an early leader in the development of emerging PCS technologies. As a part of its continuing effort to meet customer demand for innovative, technologically advanced wireless services, LOCATE, through its wholly owned subsidiary Personal Communications Network Services of New York, Inc. ("PCNS-NY"), has launched pioneering technical and marketing trials of PCS, pursuant to experimental authority granted by the Commission, in the New York City metropolitan area. PCNS-NY also plans to commence similar field trials in other areas of the country. In connection with its PCS development activities, LOCATE's Executive Vice President recently testified at the Commission's en banc hearing concerning PCS. In addition, LOCATE has participated in a variety of Commission proceedings to encourage the expeditious allocation of

necessary radio spectrum and adoption of appropriate licensing requirements so that PCS may be implemented in the United States as efficiently and quickly as possible.

LOCATE and its subsidiary are acutely aware of the growing demand for new wireless PCS services and the corresponding need to address a variety of technical and regulatory issues in order to implement successfully PCS services in the United States. To that end, PCNS-NY has designed its experiments to provide real-world data concerning the implementation of PCS in urban environments. PCNS-NY has also proposed an innovative migration plan in which spectrum would be made available for advanced PCS uses by moving existing private radio users to other frequencies pursuant to voluntarily negotiated agreements.<sup>1/</sup> PCNS-NY in its experimental progress reports has also made significant contributions to the public body of knowledge regarding spread spectrum technologies and their potential uses in PCS systems.

Consistent with its view concerning other issues important to the development of PCS in the United States, LOCATE strongly believes that the Commission should carefully examine the existing NANP and its administration to determine whether it is suitable for the U.S. telecommunications infrastructure once wireless PCS is fully introduced. It is imperative that the Commission take steps to ensure that the NANP accommodates the

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<sup>1/</sup> Significantly, the Commission recently announced its intention to adopt a plan similar to LOCATE's proposal to migrate private users from 2 GHz frequencies to make room for emerging technologies such as PCS.

unique numbering needs of PCS systems. PCS promises to overcome certain significant constraints in the existing conventional landline and wireless telecommunications networks. Through PCS, individuals will communicate directly with other individuals rather than locations. Thus, the introduction of PCS will untether end users from the telecommunications network and, for the first time, permit individuals to control fully their connections to and use of the network.

Given that a principal benefit of advanced PCS systems is the unprecedented flexibility in personal numbering, LOCATE strongly agrees with NARUC that the Commission should commence a Notice of Inquiry proceeding to evaluate the current NANP system. The existing NANP administration procedures under which Bellcore and the Bell Operating Companies determine numbering assignment policies may not fully account for and recognize the importance of addressing the unique numbering needs of PCSs. The successful and efficient development of PCS systems in the United States will likely be significantly hindered if the NANP does not adequately accommodate the anticipated introduction of these new, advanced services. Accordingly, a timely examination of the NANP scheme through a Notice of Inquiry proceeding as recommended by NARUC would benefit the public interest. An inquiry into the NANP, including its application in a PCS environment, would further the Commission's stated policy goal of promoting the introduction of innovative, spectrum-efficient services. In its recently released Policy Statement concerning personal

communications services in General Docket No. 90-314 the Commission stated:

A class of mobile and/or portable technologies and services is developing under the name of PCS that promises both advanced generations of current mobile/portable services and new services. . . The regulatory scheme we eventually decide upon [for PCS] will depend in part upon public interest factors such as our desire to promote the rapid development of this service and our interest in promoting competition in PCS and in telecommunications generally.<sup>2/</sup>

Significantly, in its Policy Statement, the Commission explicitly recognized that the "need for a new numbering plan, [and] the need to accommodate roaming subscribers" were among the various outstanding issues that must be addressed to implement PCS in the United States.<sup>3/</sup>

Contrary to the view of the NYNEX Telephone Companies, it is not premature at this time to consider the numbering needs of advanced wireless PCS technologies.<sup>4/</sup> The Commission has already stated its intention to foster initial PCS implementation in 1992.<sup>5/</sup> To that end, at a Commission meeting held on January

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<sup>2/</sup> Amendment of the Commission's Rules to Establish New Personal Communications Services, Policy Statement and Order, Gen. Docket No. 90-314 (released October 24, 1991) at ¶¶ 2, 7 ("Policy Statement").

<sup>3/</sup> Id. at ¶ 8(4).

<sup>4/</sup> See Comments of NYNEX Telephone Companies, at 10.

<sup>5/</sup> See Policy Statement at ¶ 3. The Commission has also proceeded to implement its Pioneer's Preference scheme for innovators in PCS technologies. See Pioneer's Preference Requests of Advanced Cordless Technologies, Inc., et al., Public Notice, Gen. Docket No. 90-314 (released November 27, 1991) (accepting seventeen PCS Pioneer's Preference requests for filing).

16, 1992, the Commission announced its adoption of a Notice of Proposed Rulemaking to allocate 220 Megahertz of spectrum in the 2 GHz frequency band for use by emerging technologies, such as PCS. The Commission has thus responded to the growing demand for PCS in expeditiously taking various regulatory steps necessary to introduce PCS.<sup>5/</sup> Accordingly, a review of the NANP and its administration is essential at this time in order to realize the full potential of conventional and emerging services such as PCS. The Commission should therefore reject the view of some commenters that such an inquiry should not be initiated or should be deferred until a later date.

The advent of PCS requires that the public and the Commission be given the opportunity to assess fully the specific ramifications of PCS introduction on the existing NANP system. The NANP administration must determine how to assign telephone numbers and other NANP codes that are required to introduce PCS. In particular, a consensus must be reached regarding how to implement the ubiquitous personal identification numbering system that will permit PCS end users to place and receive calls from any location. LOCATE accordingly urges the Commission to invite public comment specifically on how the issue of how PCS numbering assignments can be implemented in a way that is independent from the existing geographic hierarchy. LOCATE accordingly concurs in

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<sup>5/</sup> LOCATE encourages the Commission to further expedite the introduction of PCS by issuing a Notice of Proposed Rulemaking as a companion to its spectrum rulemaking to authorize a new service.

NARUC's view that the Commission should consider the potential number deployment strategies for PCS, as well as the equitable plans for assigning NANP codes among competing interests, including emerging PCS providers.<sup>1/</sup>

In LOCATE's view, these questions raise a number of complex issues that would be best addressed in the context of a proceeding devoted primarily to an examination of the NANP and its administration. Further, other commenters have argued that it would be useful to consider certain other issues relating to the NANP at this time in a separate proceeding.<sup>2/</sup> While LOCATE urges the Commission to ensure that PCS implementation is not delayed by additional regulatory proceedings, it believes that the public interest would be greatly served by a grant of NARUC's petition and the initiation of a Notice of Inquiry into the NANP and its administration.

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<sup>1/</sup> NARUC Petition at 6. Telocator and McCaw Cellular Communications also recognized the need to address specific PCS numbering issues in a separate proceeding. See Comments of Telocator, pp. 3-9; Comments of McCaw Cellular Communications, Inc. pp. 4-5, 10-12.

<sup>2/</sup> AT&T and MCI, for example, argue in their comments that the Commission should consider mandating nondiscriminating procedures to administer the NANP and should examine generally the administration of the NANP in a competitive environment. AT&T Comments at 3; MCI Comments at 4-8. Both Telocator and McCaw argue that the current NANP process does not adequately address the needs of existing wireless service and should be revised accordingly. Telocator Comments at 3-9; McCaw Comments at 4-12.

**CONCLUSION**

For the reasons discussed above, LOCATE supports NARUC's petition to commence a Notice of Inquiry to examine the existing North American Numbering Plan and its administration.

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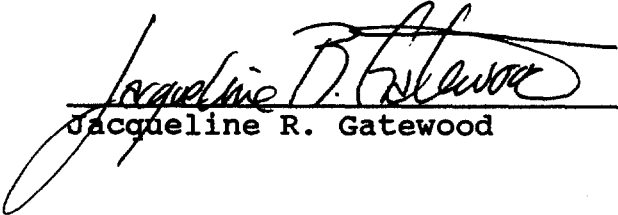
Dated: January 17, 1992



**CERTIFICATE OF SERVICE**

I hereby certify that on January 17, 1992, a copy of the foregoing document has been sent by first-class, postage-prepaid mail to the following:

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